

REMARKS

The above amendment is made in response to the Office Action mailed November 21, 2003. Claims 1-9, 11-14, 18-20 and 26 have been amended. Claims 1-26 are pending in the present application and stand rejected. The Examiner's reconsideration is respectfully requested in view of the above amendment and the following remarks.

A. Claims 1-17 rejected under § 101

The Office Action rejected claims 1-17 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Portions of the claims 1-9 and 11-14 have been amended in response to the rejection. The rejection is respectfully traversed with respect to the terms "anchor generator," "semi-link generator," "source identifier." Amended claims 1-17 are directed to a system (*e.g.*, the preamble of claims 1, 7 and 9 claim a "generalized automatic hyperlinking system") comprising a sequence of modules. (Specification, p. 11, lines 1-4; Figure 2). Such modules may be directed to software, hardware, or a combination of the two.

Withdrawal of the rejection of claims 1-17 under 35 U.S.C. § 101 is respectfully requested.

B. Claim 1 rejected under § 103(a)

Claim 1 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Rodkin et al. (U.S. Patent No. 6,092,074) (hereinafter "Rodkin") in view of Liu et al. (U.S. Patent No. 5,794,257) (hereinafter "Liu") and further in view of Foss et al. (U.S. Patent No. 5,404,534) (hereinafter "Foss"). The rejection is respectfully traversed.

The Office Action argues that Rodkin discloses “static links.” Rodkin refers to “static links” as “hard coded” (*i.e.*, pre-computed) links. (Rodkin, col. 2, lines 21-24). Rodkin does not disclose “a static hyperlinker for *automatically generating* static hyperlinks.” Further, the combination of Rodkin, Liu and Foss does not teach or suggest “a static hyperlinker for *automatically generating* static hyperlinks,” as essentially claimed in claim 1.

The Office Action argues that Foss discloses “source identifier and a source anchor generator support the incremental hyperlinking and the source-level dynamic hyperlinking.” Foss teaches a “plurality of links” which captures multiple relationships between *software objects* in object-oriented programming in a software application. (Foss, col. 5, lines 23-26; col. 5, line 65-col. 6, line 9). This is clearly distinguishable from the “*document objects*,” as claimed in claim 1. Further, Foss does not teach or suggest “support the incremental hyperlinker and the source-level dynamic hyperlinker...*at different hyperlinking stages*.” The combination of Rodkin, Liu, and Foss does not teach or suggest “a source-level partial hyperlinker comprising a source identifier and a source anchor generator connected to said source identifier...wherein the source identifier and the source anchor generator support the application of the incremental hyperlinker and the source-level dynamic hyperlinker *on document objects at different hyperlinking stages*,” as essentially claimed in claim 1.

Notwithstanding the above, it is respectfully submitted that one skilled in the art would not combine Rodkin, Liu and Foss. Rodkin discloses a system for finding the best destination address for linkage using class codes. (Rodkin, col. 5, lines 5-18). However, the effect of a “chained” sequence of class codes, as taught by Liu, may not lead to the

“best destination address” that Rodkin teaches. Further, applying the teachings of Rodkin or Liu to the “plurality of links,” as taught by Foss, would render the “plurality of links” unmanageable. Thus, the combination of Rodkin, Liu and Foss would render at least one of the prior art references unsatisfactory for its intended purpose.

C. Claims 2-26 rejected under § 103(a)

Claims 2-26 rejected under 35 U.S.C. § 103(a) as being unpatentable over Rodkin in view of Liu, and further in view of Foss, and further in view of Chang (U.S. Patent No. 5,694,594) (hereinafter “Chang”). The rejection is respectfully traversed.

The “link manager” disclosed in Chang is for calculating a link profile used for link generation. (Chang, col. 2, lines 19-21). The link profile is of no use to Rodkin’s approach of finding the best destination by class codes. In fact, it is respectfully submitted that using the link profile of Chang in Rodkin’s approach would essentially change the principle of operation of Rodkin (*i.e.*, finding the best destination by class codes). Thus, one skilled in the art would have no motivation to combine Rodkin, Liu and Foss with Chang.

Further, Chang discloses applying link browsing and document browsing to display document objects for the user to determine the anchors and links to be generated and captured in the database. (Chang, col. 3, line 62- col. 4, line 7). The combination of Rodkin, Liu and Foss, does not have the requisite structure for combining the link browsing and document browsing capabilities of Chang.

Regarding at least claim 7, Foss does not disclose that is *software objects* are subject to calculation or profiling. It is respectfully submitted that due to the domain of

Foss' approach, the software objects are not subject to calculation or profiling. Thus, there is no possibility for combining Chang's link manager with Foss.

Regarding at least claim 9, the dynamic hyperlinking concept taught by Rodkin is implicit in software code. (Rodkin, col. 3, lines 29-32). There is no possibility to separate the intermediate link information in such software code in a usable way for determining the final links. That is, the links generated dynamically by Rodkin's approach are fixed (subject to application of the class code), and cannot be used for generating additional final destinations.

Regarding at least claim 18, the document browser taught by the combination of Rodkin, Liu, Foss and Chang is used for identifying objects in different documents to be linked together. (Chang, col. 3, line 62-col. 4, line 7). The combination does not teach or suggest "utilizing a document browser, said document browser *for viewing and following links from one document to another*," as essentially claimed in claim 18.

Regarding claim 20, the combination of Rodkin, Liu, Foss and Chang teach searching the best destination based on qualification in terms of class code, which is a hard-coded mechanism. (Rodkin, col. 2, lines 21-24). The recited combination does not teach or suggest "identifying an intermediate destination *based on user-defined criteria*" and "identifying a destination *based on user-defined criteria*," as essentially claimed in claim 20.

Regarding claim 26, the link browser taught by Chang is related to link generation and is used to refine the link information. (Chang, col. 3, line 62-col. 4, line 7). The combination of Rodkin, Liu, Foss and Chang does not teach or suggest "said link browser

invoking the means for link interpretation for determining actions to be taken when a link is selected,” as essentially claimed in claim 26.

Further, the link profile taught by Chang provides a mechanism for a user to specify heuristic information such as threshold, node size, etc. (Chang, col. 4, line 6; col. 4, line 45). The combination of Rodkin, Liu and Foss does not have this structure of links. Thus, there is no possibility of using the link browser of Chang for the kind of links taught by the combination of Rodkin, Liu and Foss.

D. Conclusion

Accordingly, claim 1 is believed to be patentably distinguishable and nonobvious in view of Rodkin, Liu and Foss. Claims 7, 9, 18, 20 and 26 are believed to be patentably distinguishable and nonobvious in view of Rodkin, Liu, Foss and Chang. Dependent claims 2-6 are believed to be allowable for at least the reasons given for claim 1. Dependent claims 8, 10-17, 19, and 21-25 are believed to be allowable for at least the reasons given for claims 7, 9, 18, 20 and 26. Withdrawal of the rejection of 1-26 under 35 U.S.C. §103(a) is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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